

CHRISTOPHER CHIOU  
Nevada Bar No. 14853  
Acting United States Attorney  
ERIC C. SCHMALE  
Assistant United States Attorney  
501 Las Vegas Blvd. South, Suite 1100  
Las Vegas, Nevada 89101  
Tel: 702-388-6336  
eric.schmale@usdoj.gov

JOSEPH BEEMSTERBOER  
Acting Chief, Fraud Section  
SARA HALLMARK  
Trial Attorney  
Department of Justice  
Fraud Section  
1400 New York Avenue, NW  
Washington, D.C. 20005  
sara.hallmark2@usdoj.gov

*Attorneys for the United States*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRANDON CASUTT,

Defendant.

Case No.: 2:20-cr-231-AGP-NJK

**STIPULATION REGARDING  
PROTECTIVE ORDER**

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, Acting United States Attorney; Eric Schmale, Assistant United States Attorney; Sara Hallmark, Trial Attorney, Fraud Section; and Rene L. Valladares, Federal Public Defender, and Maggie Lambrose, Assistant Federal Public Defender, counsel for the defendant Brandon Casutt, that the Court enter the attached proposed protective order

1 regarding the government's concurrently filed under seal Motion in Limine to Limit Cross  
2 Examination, related discovery provided regarding the Motion in Limine, any response or  
3 reply briefing, and any exhibits thereto, (collectively, the "Protected Motion in Limine  
4 Materials"), provided to the defense.

5 This Stipulation is entered into for the following reasons:

6 1. The government is providing the defense with sensitive non-public discovery  
7 materials relating to an expected government trial witness;

8 2. The government is filing a sealed motion in limine to limit cross  
9 examination with regards to these discovery materials and the expected government trial  
10 witness;

11 3. The parties agree that all such Protected Motion in Limine Materials should  
12 remain confidential and be treated in accordance with the procedures in the attached  
13 proposed protective order.

14  
15 DATED this 17th day of March, 2022.

16 Respectfully submitted,

17 RENE L. VALLADARES  
18 Federal Public Defender

NICHOLAS A. TRUTANICH  
United States Attorney

19 /s/ Maggie Lambrose  
MAGGIE LAMBROSE  
Assistant Federal Public Defender  
Counsel for Defendant  
Anthony Uvari

/s/ Eric Schmale  
SARA HALLMARK  
Trial Attorney, Fraud Section  
ERIC C. SCHMALE  
Assistant United States Attorney

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRANDON CASUTT,

Defendant.

Case No.: 2:20-cr-231-AGP-NJK

**PROTECTIVE ORDER**

IT IS HEREBY ORDERED that the following protective measures shall apply with respect to information in the government's concurrently filed Motion in Limine to Limit Cross Examination, related discovery provided to the defense regarding the Motion in Limine, any response or reply briefing, and any exhibits (the "Protected Materials"):

1. Access to the Protected Materials shall be restricted to the following individuals: the named defendant, attorneys for all parties, and any personnel that the attorneys for all parties consider necessary to assist in performing that attorney's duties in the prosecution or defense of this case, including investigators, paralegals, retained experts, support staff, and any other individuals specifically authorized by the Court (collectively, the "Covered Individuals").

2. The Covered Individuals shall be advised of the Protective Order, and, without leave of Court, the Covered Individuals shall not:

- a. make copies for, or allow copies of any kind to be made by any other person of the Protected Documents in this case;
- b. allow any other person to read or review the Protected Materials in this case;
- c. use the Protected Materials for any purpose other than litigating the charges in this case; or

1 d. attach any Protected Materials to any of the pleadings, briefs, or other court  
2 filings except to the extent those pleadings, briefs, or filings are filed under seal or properly  
3 compliant with LR IC 6-1.

4 3. Nothing in this stipulation is intended to restrict the Covered Individuals from  
5 discussing the content of the Protected Materials with the defendant.

6 4. The parties shall inform any person to whom disclosure may be made  
7 pursuant to this order of the existence and terms of this Court's order.

8 5. The parties further agree that this protective order shall be filed under seal  
9 because it discusses matters filed under seal.

10 IT IS SO ORDERED.

11 DATED this 26th day of March, 2022.

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14 HONORABLE ANDREW GORDON  
15 UNITED STATES DISTRICT COURT JUDGE  
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